

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RADIO MUSIC LICENSE COMMITTEE,
INC.,

Plaintiff,

v.

GLOBAL MUSIC RIGHTS, LLC,

Defendant.

Civil Action

No. 2:16-cv-06076-CDJ

Judge C. Darnell Jones, II

**RADIO MUSIC LICENSES COMMITTEE, INC.'S AND GLOBAL MUSIC RIGHTS,
LLC'S JOINT CONSENT MOTION TO ESTABLISH BRIEFING SCHEDULE FOR
MOTION TO DISMISS**

Pursuant to the Court's January 11, 2017 Order (Dkt. No. 47), Plaintiff Radio Music License Committee ("RMLC") and Defendant Global Music Rights, LLC ("GMR") jointly respectfully request that the Court enter the parties' agreed briefing schedule to establish deadlines for GMR's motion to dismiss RMLC's Complaint (Dkt. No. 1). The grounds for this motion are as follows:

The parties have conferred and have agreed that, if it is acceptable to the Court, GMR shall file any motion to dismiss on January 20, 2017, RMLC shall have until February 17, 2017 to file its opposition to GMR's motion, and GMR shall have until March 3, 2017 to file its motion for leave to submit a reply brief accompanied by its proposed reply. RMLC further agrees not to oppose GMR's motion for leave to file such a reply. The parties have further agreed that by submitting this joint motion, GMR does not waive its right to assert a lack of personal jurisdiction or improper venue.

The parties' jointly respectfully request that the Court grant this motion and enter the attached proposed order reflecting this briefing schedule.

Dated: January 13, 2017

Respectfully submitted,

/s/ Margaret M. Zwisler

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CERTIFICATION OF COUNSEL

The undersigned certifies that, on January 13, 2017, counsel for RMLC conferred with counsel for defendant GMR regarding the relief sought by this motion and that all parties agree to the proposed briefing schedule for GMR's motion to dismiss RMLC's Complaint, RMLC's opposition to that motion, and GMR's motion for leave to file a reply. This motion is unopposed and consented to by all parties.

/s/ Margaret M. Zwisler
Margaret M. Zwisler (*pro hac vice*)

CERTIFICATE OF SERVICE

The undersigned certifies that, on January 13, 2017, a true and correct copy of the foregoing Radio Music License Committee, Inc.'s and Global Music Rights, LLC's Joint Consent Motion To Establish Briefing Schedule for Motion To Dismiss was served on all counsel of record by the Court's electronic filing system (CM/ECF).

/s/ Margaret M. Zwisler

Margaret M. Zwisler (*pro hac vice*)